

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

CARPENTERS' DISTRICT COUNCIL OF
GREATER ST. LOUIS, et al.,

Plaintiffs,

v.

WILLIAM FRANKLIN GRIFFIN, JR., an
individual, d/b/a GRIFFIN BROTHERS
CONSTRUCTION,

Defendant.

Case No. 4:07CV493(CEJ)

STIPULATION FOR ENTRY OF CONSENT JUDGMENT

Come now the parties and stipulate as follows:

1. Judgment shall be entered in favor of plaintiffs and against defendant William Franklin Griffin, Jr., an individual, doing business as Griffin Brothers Construction in the amount of \$76,619.24, which consists of delinquent contributions owed for the period of August 22, 2006 through May 29, 2007 in the amount of \$56,371.31, liquidated damages in the amount of \$11,274.26, interest in the amount of \$8,473.67, and attorneys' fees and court costs of \$500.00.

2. Execution on the judgment amount set forth in paragraph 1, above, shall be stayed so long as defendant complies with paragraphs 3 and 4, below.

3. Defendant shall make payments to plaintiffs pursuant to the following schedule:

- 1) \$3,159.52 on or before July 1, 2007;
- 2) \$3,159.52 on or before August 1, 2007;
- 3) \$3,159.52 on or before September 1, 2007;
- 4) \$3,159.52 on or before October 1, 2007;
- 5) \$3,159.52 on or before November 1, 2007;
- 6) \$3,159.52 on or before December 1, 2007;
- 7) \$3,159.52 on or before January 1, 2008;
- 8) \$3,159.52 on or before February 1, 2008;

- 9) \$3,159.52 on or before March 1, 2008;
- 10) \$3,159.52 on or before April 1, 2008;
- 11) \$3,159.52 on or before May 1, 2008;
- 12) \$3,159.52 on or before June 1, 2008;
- 13) \$3,159.52 on or before July 1, 2008;
- 14) \$3,159.52 on or before August 1, 2008;
- 15) \$3,159.52 on or before September, 2008;
- 16) \$3,159.52 on or before October 1, 2008;
- 17) \$3,159.52 on or before November 1, 2008; and
- 18) \$3,159.47 on or before December 1, 2008.

4. Defendant shall submit his reports and contributions to the Carpenters Funds on or before the date due as set forth in the collective bargaining agreement to which defendant is party, or to which defendant becomes party during the period set forth in paragraph 3, above, beginning with the period of May 30, 2007 and continuing thereafter.

5. If defendant fails to make a payment when due pursuant to paragraph 3 above, or fails to submit his reports and contributions as required by paragraph 4, above, the entire judgment, less any payments made, shall become immediately due. If defendant complies with paragraphs 3 and 4, above, then payment of the amount referenced in paragraph 3 shall satisfy this judgment.

6. The parties acknowledge that this Stipulation is based upon unaudited reports submitted by defendant, and that if plaintiffs discover through an audit of defendant's records that additional amounts are owed, then plaintiffs shall be entitled to pursue the collection of such amounts.

WHEREFORE, the parties stipulate to entry of a consent judgment according to the above terms.

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WILLIAM FRANKLIN GRIFFIN

Defendant

SO ORDERED:



CAROL E. JACKSON
CHIEF UNITED STATES DISTRICT JUDGE

Date: July 9, 2007